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CLERK US DISTRICT COURT
DISTRICT OF ARIZONA

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CR21-02593 TUC-JAS(EJM)

14 IN THE UNITED STATES DISTRICT COURT
15 FOR THE DISTRICT OF ARIZONA

16 United States of America,

17 Plaintiff,

18 vs.

19 1. Douglas Lane Gibson
20 (Counts 1,2)

21 2. [REDACTED]

22 3. [REDACTED]

23 4. [REDACTED]

24 5. [REDACTED]

25 Defendants.

INDICTMENT

Violations:

21 U.S.C. §§ 846 and 841(a)(1) and
841(b)(1)(C)
(Conspiracy to Possess with Intent to
Distribute MDMA)
Count 1

21 U.S.C. § 841(a)(1) and 841(b)(1)(C);
18 U.S.C. § 2
(Possession with Intent to Distribute
MDMA; Aid and Abet)
Counts 2 through 5

(UNDER SEAL)

THE GRAND JURY CHARGES:

COUNT 1

26 Beginning at a time unknown, to on or about March 12, 2020, in the District of
27 Arizona, DOUGLAS LANE GIBSON, [REDACTED] [REDACTED]
28 [REDACTED] [REDACTED] and [REDACTED] did knowingly and intentionally
combine, conspire, confederate and agree with persons known and unknown to the grand

1 jury, to possess with intent to distribute a usable quantity of 3,4-
2 Methylenedioxymethamphetamine (MDMA), a Schedule I Controlled Substance; in
3 violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

4 All in violation of Title 21, United States Code, Section 846.

5
6 **COUNT 2**

7 On or about between January 28, 2019 and March 12, 2020, in the District of
8 Arizona, DOUGLAS LANE GIBSON did knowingly and intentionally possess with intent
9 to distribute 1.415 kilograms or more of a mixture or substance containing 3,4-
10 Methylenedioxymethamphetamine (MDMA), a Schedule I Controlled Substance; in
11 violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C) and did aid
12 and abet the distribution thereof in violation of Title 18, United States Code, Section 2.

13
14 **COUNT 3**

15 On or about between February 20, 2019 and June 8, 2019, in the District of Arizona,
16 [REDACTED] did knowingly and intentionally possess with intent to
17 distribute 995 grams or more of a mixture or substance containing 3,4-
18 Methylenedioxymethamphetamine (MDMA), a Schedule I Controlled Substance; in
19 violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C) and did aid
20 and abet the distribution thereof in violation of Title 18, United States Code, Section 2.

21
22 **COUNT 4**

23 On or about February 22, 2019, in the District of Arizona, [REDACTED]
24 [REDACTED] did knowingly and intentionally possess with intent to distribute 380 grams or
25 more of a mixture or substance containing 3,4-Methylenedioxymethamphetamine
26 (MDMA), a Schedule I Controlled Substance; in violation of Title 21, United States Code,
27

1 Sections 841(a)(1) and 841(b)(1)(C) and did aid and abet the distribution thereof in
2 violation of Title 18, United States Code, Section 2.

3 **COUNT 5**

4 On or about February 5, 2019, in the District of Arizona, [REDACTED]
5 [REDACTED] did knowingly and intentionally possess with intent to distribute
6 375 grams or more of a mixture or substance containing 3,4-
7 Methylenedioxymethamphetamine (MDMA), a Schedule I Controlled Substance; in
8 violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C) and did aid
9 and abet the distribution thereof in violation of Title 18, United States Code, Section 2.

10
11 A TRUE BILL

12 /S/

13 FOREPERSON OF THE GRAND JURY

14 Date: «GJdate» OCT 05 2021

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17 /S/

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**REDACTED FOR
PUBLIC DISCLOSURE**